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May 9, 1979

BY MESSENGER

Ms. Anne Markey
Assistant Attorney General
188 West Randolph Street
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Dear Ann:

I thought it would be helpful to put down on paper the various options for scheduling depositions next week. The following takes into account information received from Dick Goddard after our conference call which indicates that Mr. Altmeter will be available only on Thursday and Friday.

We suggest that Wednesday, the 16th be devoted to the deposition of Greg Minor except for the corrosion issues. There is a chance we could produce Walt Shewski on the 16th but this would impose a very substantial burden on him since he is already scheduled to testify on another matter that same day.

For Thursday, we suggest that the depositions of Messrs. Johnson, Draley and Altmeter; that is, all the corrosion witnesses. On Friday, we would finish the deposition of Mr. Minor with respect to the corrosion issues. This would allow Greg to be thoroughly familiar with these issues and hopefully he would be able to state with some particularity the corrosion problems he sees after hearing from Commonwealth Edison's and the NRC's witnesses on the subject. If we have any remaining time on Friday, Commonwealth would more than be happy to make Walt Shewski available.



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Ms. Anne Markey
May 9, 1979
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It appears that another round of depositions will be necessary to cover the NRC's expert on accidents, Peter Cleary, and the Attorney General's other experts who have not yet been identified.

If you or Susan have any suggestions, please give me or Alan Bielawski a call. Commonwealth will do whatever is reasonable to accommodate the other parties in this proceeding.

Sincerely yours,

Philip Steptoe

PS:lk
cc: Zion Service List

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